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28 DFINITY USA RESEARCH, LLC

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12 UNITED STATES DISTRICT COURT
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14 NORTHERN DISTRICT OF CALIFORNIA

15 DFINITY USA RESEARCH, LLC, a limited
16 liability company,

17 Plaintiff,

18 v.
19 ERIC BRAVICK, an individual and DOES 1
20 through 100, inclusive,

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28 Defendant.

Case No. 5:22-cv-03732-EJD

**JOINT STATEMENT IN RESPONSE
TO ORDER TO SHOW CAUSE**

Complaint filed: May 11, 2022

1 By and through their respective counsel, Plaintiff DFINITY USA Research, LLC
 2 (“DFINITY”) and Defendant Eric Bravick (“Bravick”) (collectively, “Parties”) submit this joint
 3 statement in response to the Order to Show Cause re Settlement (Dkt. No. 25, Apr. 4, 2023).

4 **A. Status of the Settlement Agreement**

5 Although the Parties agreed in principle upon the economics of a settlement and
 6 expectation that a written settlement agreement would be prepared, the Parties have since
 7 exchanged multiple settlement agreement iterations and have agreed in principle on all but one
 8 term of the settlement—the scope and nature of the release.

9 **B. Prospects for Further Negotiation**

10 The Parties continue to be willing to negotiate a settlement of the claims and believe a
 11 resolution can be reached. The Parties thus request an additional three weeks to continue
 12 negotiations.

13 **C. Procedural Next Steps**

14 The Parties respectfully request that the Court reschedule the hearing on the Order to
 15 Show Cause, currently set for June 1, 2023, to June 22, 2023, and order the Parties to submit an
 16 additional Joint Statement on or before June 9, 2023.

17 Dated: May 19, 2023

Respectfully submitted,

18 CROWELL & MORING LLP

19 By: /s/ Joachim B. Steinberg

20 Gabriel M. Ramsey
 Joachim B. Steinberg

21 Attorneys for Defendant
 ERIC BRAVICK

22 Dated: May 19, 2023

BAKER & MCKENZIE LLP

23 By: /s/ Bradford K. Newman

24 Bradford K. Newman
 Christina M. Wong

25 Attorneys for Plaintiff
 DFINITY USA RESEARCH, LLC

FILER'S ATTESTATION

I, Joachim B. Steinberg, am the ECF user whose identification and password are being used to file this **JOINT STATEMENT IN RESPONSE TO ORDER TO SHOW CAUSE**. I hereby attest that the other above-named signatory concurs in this filing.

Dated: May 19, 2022

/s/ Joachim B. Steinberg

Joachim B. Steinberg